

COMMUNICATIONS STRATEGY**Notice of Proposed Approval of Los Angeles County Lead Attainment SIP****Expected Signature Date: December X, 2013****TABLE OF CONTENTS**

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1. PROJECT LEADS

Air Program Leads:

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2. FACT SHEET (EXTERNAL)

Los Angeles County Lead Attainment SIP - Proposed Approval - U.S. EPA Fact Sheet Summary

- EPA is proposing to approve the lead (Pb) air quality plan for the South Coast area in California. This plan, known as a State Implementation Plans (SIP), is the roadmap to meeting the 2008 lead National Ambient Air Quality Standard (NAAQS) of 0.15 ug/m³ by December 31, 2015. The NAAQS are set by the U.S. EPA to protect public health.
- The South Coast Air Quality Management District (SCAQMD) has adopted and implemented rules that will continue to control lead emissions.
- This proposed action will be published in the Federal Register and will include a 30-day public comment period from the date of publication. EPA's Federal Register notice and technical support document contain detailed information on our proposed action.

Background

- EPA first established a lead standard in 1978 at 1.5 ug/m³. Based on new health and scientific data, EPA revised the federal lead standard to 0.15 ug/m³ on October 15, 2008.
- The SCAQMD has been authorized by EPA to implement the federal Clean Air Act, including the federal air quality standard for lead. SCAQMD has been working closely with the Exide Vernon facility to reduce these emissions for a number of years.
- EPA has an oversight role regarding CAA enforcement programs and Title V operating permit programs, and will step in if an authorized air agency's implementation is inadequate. However, SCAQMD Rule 1420.1 establishes significantly more stringent controls for lead air emissions from Exide than other local, state or federal rules in place.
- In 2010, a portion of Los Angeles County was designated as not attaining the NAAQS of 0.15 ug/m³. A SIP was due 18 months later.
- The State submitted the *Final 2012 Lead State Implementation Plan – Los Angeles County* to EPA on June 20, 2012. The plan outlines steps that will bring the area into attainment of the standards.
- Primary sources of lead are generally large industrial sources, including metals processing, particularly primary and secondary lead smelters. Lead can also be emitted by iron and steel foundries and primary and secondary copper smelters.

Next Steps

- EPA is providing a 30-day public comment period on its proposed action.

For More Information: <http://www.epa.gov/region9/air/actions/ca.html>

3. TALKING POINTS ([REDACTED])

Today's Proposed Action

- Today, the EPA is proposing to approve California's plan for attaining the health-based air quality standards for lead (Pb) in the South Coast by December 31, 2015.
- California is a national leader in air pollution controls that protect public health by improving air quality. The emission reductions needed to demonstrate maintenance of the Pb standard have already been adopted by the South Coast Air District.
- We commend the District for the actions it has taken to adopt local rules that help lower lead levels in this area, including rules controlling emissions from secondary lead smelters and other industrial sources of lead emissions.
- South Coast Rule 1420.1 was approved into the California SIP in January of 2013 and is federally enforceable.

Effect of Proposed Approval

- If EPA finalizes today's approval, the South Coast area will have an approved attainment SIP for the 2008 lead NAAQS.
- EPA's proposal will be published in the Federal Register within about two weeks and we will accept comments for 30 days.

Ambient Lead Concentrations

- Air monitoring has shown that the Los Angeles County lead nonattainment area has not exceeded the federal lead standard in 2012 or 2013. Attainment of the lead standard requires the maximum 3-month mean concentration for a 3-year period to be less than the standard.
- SCAQMD's health risk assessment, issued in the spring of 2013, was for arsenic emissions, not lead.
- Recent monitored ambient lead values at the Exide Vernon facility were not exceedances of the federal NAAQS of 0.15 ug/m³. Rather, Exide exceeded a level set in the District's Rule 1420.1, Emissions Standard for Lead From Large Lead-Acid

Battery Recycling Facilities, requiring the facility to implement a compliance plan, which included cutting production by 15% until ambient fenceline concentrations do not exceed the limits in SCAQMD Rule 1420.1.

- Exide's closure on April 24, 2012 due to the California Department of Toxic Substances Control's (DTSC) Order of Temporary Suspension was not related to ambient lead concentrations but to a hazardous waste leak. As a result of the Order, Exide was closed until June 17. EPA meets regularly with DTSC to coordinate federal and state efforts on the hazardous waste permitting and enforcement programs.
- SCAQMD Rule 1420.1 requires a series of emissions controls and facility monitoring.
 - Each facility is required to operate a minimum of four monitors at facility locations approved by SCAQMD. Sampling sites at the property line may be located just inside the fence line on facility property if logistical constraints preclude placement outside the fence line. Exide Vernon operates 7 monitors at the facility fenceline.
- In addition, SCAQMD monitors at 4 locations near Exide Vernon. The Exide-Rehrig monitor run by SCAQMD is the one that is closest to the fenceline of the Exide-Vernon facility that is used for comparison with the federal ambient air quality standard.
- Recent monitored ambient lead values at the Exide Vernon facility were not exceedances of the federal NAAQS. Rather, Exide exceeded a level set in the District's Rule 1420.1, Emissions Standard for Lead From Large Lead-Acid Battery Recycling Facilities, requiring the facility to cut production by 15%.

4. QUESTIONS AND ANSWERS

Isn't this facility the reason that the SC is in nonattainment of the lead NAAQS?

The designation of Los Angeles County as nonattainment for the 2008 lead NAAQS was based primarily on monitored air quality data collected during 2006-2008. That data indicated both Exide and Trojan Battery were violating the 2008 lead NAAQS. The South Coast attainment plan also identified Quemetco as having the potential to cause a violation of the 2008 lead NAAQS. Since 2006, Exide, Trojan and Quemetco have significantly reduced lead emissions from their facilities.

Why are you proposing to approve this plan when the SC has asked their board to shut down the facility?

SCAQMD has asked their board to shut down Exide's lead smelting operations because the facility had violated SCAQMD Rule 1407 and permit conditions to control toxic emissions, including but not limited to arsenic. Rule 1407 reduces emissions of arsenic, cadmium, and nickel from non-ferrous metal melting operations. EPA has reviewed the air quality plan submitted by the State in June of 2012 and proposes to find that it meets CAA requirements. The plan demonstrates that the area will attain the 2008 lead NAAQS by its attainment date of December 31, 2015. Exide has not contributed to exceedances of the federal ambient air quality standard since late 2011.

What good are monitors if they alert the community to excess emissions after it happens?

The fenceline monitors operated by Exide and Quemetco serve as an early warning system. These facility-run monitors record concentrations that are compared to limits in SC Rule 1420.1. The limits are more stringent than the federal lead NAAQS, and trigger actions to reduce concentrations before the health-protective federal NAAQS is exceeded.

Key Stakeholders

California Air Resources Board (CARB)

South Coast Air Quality Management District (SCAQMD)

Brent will do advance work with State Senator who was interested in Exide.

5. COMMUNICATIONS STRATEGY

Detailed Rollout Roles and Responsibilities

Who	When	Task	Notes
Jared		Signs notices	
Wienke	Upon signature	PDF signed notice Email to Web team for posting	Web team holds posting until initial calls are made.
Debbie or Elizabeth calls SC, ARB	Upon signature	1. Call. 2. Email Richard, Lynn, Barry. See Section 6 for transmittal note. Cc: Elizabeth, Bcc: Wienke, Doris, Niloufar	Richard Corey rcorey@arb.ca.gov 916-322-7077 Lynn Terry lterry@arb.ca.gov 916-322-2739 Barry Wallerstein bwallerstein@aqmd.gov (909) 396-2131 Elaine Chang echang@aqmd.gov 909-396-3186
Brent	Send courtesy copy of PR and fact sheet to Congressionals 30 minutes before PR/URL go out		

Niloufar		Ask OPA to go live with URL	
Niloufar alerts Nahal to send out PR	After URL is live, Elizabeth has called ARB/district	Issue PR – prepare for calls Spokespersons: Elizabeth	
Wienke	After PR	Email	Phil Fine, Joe Cassmassi, Victoria Moaveni, Sylvia Vanderspek

6. ELIZABETH'S TRANSMITTAL EMAIL

To: rcorey@arb.ca.gov, lterry@arb.ca.gov, bwallerstein@aqmd.gov, echang@aqmd.gov

bcc: Matt Lakin, Niloufar Glosson, Wienke Tax, Brent Maier

Subject: Notice of Proposed Approval of 2012 Los Angeles County Lead Attainment SIP

Dear colleagues --

Regional Administrator Jared Blumenfeld signed a Federal Register notice today proposing approval of the attainment plan for the Los Angeles County lead nonattainment area. The notice should be published in the Federal Register within 2 weeks. That publication will begin a 30-day public comment period. We will consider all comments when making our decision about a final action on this plan. You can view a prepublication signed version of the notice at the following URL: <http://www.epa.gov/region9/air/actions/ca.html>.

If you have any questions, please call me at 415-972-3183.

Elizabeth Adams

Deputy Director, Air Division

U.S. EPA Region 9

Phone: (415) 972-3183

7. WEBSITE AND URL LANGUAGE

This URL will go live after our calls have been made:
<http://www.epa.gov/region9/air/actions/ca.html>

South Coast

Proposed Approval of the 2012 Los Angeles County Lead Attainment SIP

On **December X, 2013**, EPA's Regional Administrator signed a proposed rule to approve the 2012 Los Angeles County Lead Attainment SIP. The plan was developed and adopted by the South Coast Air Quality Management District and adopted and submitted by the California Air Resources Board, and shows how the area will attain the lead standard by the attainment date of December 31, 2015. We are taking public comments for 30 days after the publication of our action in the Federal Register.

- FR Notice (prepublication signed version)
- Fact Sheet